

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. Nos. 5202, 5203, 5204, 6728, 7218, 7306

**WITNESS LIST OF FONDATION SERENDIPITY, FONDATION ELEMENTS,
SERENDIPITY NETWORK LTD, AND LIQUIDITY NETWORK LTD FOR
EVIDENTIARY HEARING ON MARCH 20, 2024, AT 10:00 A.M. (ET)**

PLEASE TAKE NOTICE that the United States Bankruptcy Court for the District of Delaware (the “Court”) has scheduled a hearing (the “Evidentiary Hearing”) in the above-captioned chapter 11 cases (the “Chapter 11 Cases”) before the Honorable John T. Dorsey, United States Bankruptcy Judge for the District of Delaware, at the Court, 824 North Market Street, 5th Floor, Courtroom 5, Wilmington, Delaware, for **March 20, 2024, at 10:00 a.m. (ET)** to consider the *Motion of Debtors to Estimate Claims Based on Digital Assets* [D.I. 5202] (the “Claims Estimation Motion”).

PLEASE TAKE FURTHER NOTICE that, in compliance with the *Stipulation and Agreed Scheduling Order* [D.I. 7218-1] and the *Chambers Procedures for Judge John T. Dorsey*, Fondation Serendipity, Fondation Elements, Serendipity Network Ltd, and Liquidity Network Ltd (collectively, the “Creditors”) respectfully submit this witness list (the “Witness List”) identifying the witnesses that the Creditors intend to introduce at the Evidentiary Hearing.

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

PLEASE TAKE FURTHER NOTICE that the Creditors reserve the right to: (i) amend and/or supplement this Witness List at any time prior to the Evidentiary Hearing; (ii) elicit testimony from any witness called by any party, whether through direct examination, cross-examination, or otherwise; (iii) call any witness necessary to authenticate documents (to the extent necessary); (iv) call any witness identified by the Debtors or any other parties in interest; and (v) call any witness to provide rebuttal or impeachment testimony (as appropriate).

WITNESS(ES)

A. Fotis Konstantinidis

1. Mr. Konstantinidis is a Managing Director with Stout Risius Ross, LLC (“Stout”). The Creditors engaged Stout to assess the data and methodologies detailed in the *Declaration of Sabrina T. Howell in Support of the Motion of Debtors to Estimate Claims Based on Digital Assets* [D.I. 5203] filed in the Chapter 11 Cases on December 27, 2023, and the *Declaration of Kevin Lu in Support of Motion of Debtors to Estimate Claims Based on Digital Assets* [D.I. 5204] filed in the Chapter 11 Cases on December 27, 2023.
2. Mr. Konstantinidis will be present in the courtroom and will testify in opposition to the Claims Estimation Motion.
3. The content of Mr. Konstantinidis’ testimony is set forth in the *Expert Report of Fotis Konstantinidis*, which was prepared on behalf of Maps Vault Ltd. and Oxygen Vault Ltd. and served on January 26, 2024, as well as a supplemental *Expert Report of Fotis Konstantinidis*, which was prepared on behalf of the Creditors and served on January 26, 2024 (together, the “Konstantinidis Reports”). Mr. Konstantinidis also will offer testimony regarding the (a) *Supplemental Declaration of Sabrina T. Howell in Support of Motion to Estimate Claims Based on Digital Assets* [D.I. 6728-4], which was filed in the Chapter 11 Cases on January 28, 2024, and (b)(i) *Rebuttal Expert Report of Sabrina T. Howell* and (ii) *Response of Kevin Lu to Expert Report of Fotis Konstantinidis*, each of which was served by the Debtors on February 9, 2024. See D.I. 7306.
4. Mr. Konstantinidis will have a copy of the Konstantinidis Reports and other relevant exhibits.
5. The Creditors anticipate that Debtors will request to cross-examine this witness. The Debtors are represented by Sullivan & Cromwell LLP.

Dated: February 21, 2024
Wilmington, Delaware

Respectfully submitted,

REED SMITH LLP

/s/ Kurt F. Gwynne

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